

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CARLYLE AVIATION MANAGEMENT  
LIMITED, ACCIPITER INVESTMENTS  
AIRCRAFT 4 LIMITED, VERMILLION  
AVIATION (TWO) LIMITED, ACCIPITER  
HOLDINGS DAC, MAVERICK AVIATION  
HOLDINGS LTD., MANCHESTER  
AVIATION FINANCE S.a.r.l., WELLS  
FARGO TRUST COMPANY, N.A., not in its  
individual capacity but solely in its capacity as  
OWNER TRUSTEE, UMB BANK, N.A., not in  
its individual capacity but solely in its capacity  
as OWNER TRUSTEE,

*Plaintiffs,*

v.

FRONTIER AIRLINES, INC.

*Defendant.*

Case No. 1:23-cv-04774 (PAE)

[Rel. 1:22-cv-02943 (PAE)]

**NOTICE OF CROSS-MOTION**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law, any reply papers filed in support, and all prior pleadings and proceedings herein, Defendant Counterclaim-Plaintiff Frontier Airlines, Inc. respectfully moves this Court, before the Honorable Paul A. Engelmayer, United States District Judge for the Southern District of New York, 40 Foley Square, Courtroom 1305, New York, New York 10007, for an order pursuant to Rule 42(a) of the Federal Rules of Civil Procedure consolidating the above-captioned action with the related action captioned *Frontier Airlines, Inc. v. AMCK Aviation Holdings Ireland Ltd.*, Case No. 22-cv-02943 (PAE) (S.D.N.Y.), and granting such further relief as the Court deems just and proper.

Dated: New York, New York  
October 23, 2023

Respectfully Submitted,

**BINDER & SCHWARTZ LLP**

/s/ Eric B. Fisher

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